

LAW OFFICES OF RICHARD A. FOGEL, P.C.

AV RATED/BEST'S RECOMMENDED INSURANCE ATTORNEY

RICHARD A. FOGEL, ESQ.
389 CEDAR AVENUE
ISLIP, N.Y. 11751-4627
(516) 721-7161
(631) 650-5254 (FAX)
RFOGEL@RFOGELLAW.COM

.....
**Insurance Coverage, Toxic Torts, Environmental,
Product Liability & Commercial Litigation**
New York & New Jersey
www.rfogellaw.com

February 10, 2023

VIA DNJ ECF

Hon. Leda Dunn Wettre
United States District Court for the District of New Jersey
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, N.J. 07101

Re: *Sawhney v. Chubb Insurance Company of New Jersey*
Docket No. 2:21-cv-14675-KSH-LDW

Your Honor:

This firm represents the plaintiffs in the above referenced insurance coverage litigation. The parties have conferred, and this letter is submitted by the parties jointly in response to the court order for a proposed discovery schedule post mediation if the case is not resolved.

Factual Disclosure

All deps limited to 8 hours unless otherwise court ordered.
All deps via Zoom unless parties otherwise agree on travel costs.

5/2 Dr. Sawhney
5/9 Dr. Bhardwaj
5/16 William McCudden
5/23 Diane Forstell (pursuant to subpoena) subject to non-party witness availability
5/31 Gary McGowan (pursuant to subpoena) subject to non-party witness availability
6/13 Aiston (pursuant to subpoena) subject to non-party witness availability
6/20 Andrea Pitsch (pursuant to subpoena) subject to non-party witness availability

Expert Disclosure

Expert reports Mutual exchange 8/1

Hon. Leda Dunn Wettre
January 23, 2023
Page 2 of 2

Responding Expert Reports Mutual exchange 9/1

Expert Depositions

10/4 Kagan (subject to expert witness availability)
10/11 Linsner (subject to expert witness availability)
10/18 Slayter (subject to expert witness availability)
10/25 Firsker (subject to expert witness availability)
11/1 Other Plaintiff (subject to expert witness availability)
11/8 Forstell (subject to expert witness availability)
11/ 21 Pitsch (subject to expert witness availability)
11/29 Other Defendant (subject to expert witness availability)

SJ Motions 12/31

Thank you for your time and consideration.

Respectfully submitted,

Richard A. Fogel

Richard A. Fogel

cc: Cynthia Bernstiel, Esq., George McClellan, Esq., by ECF